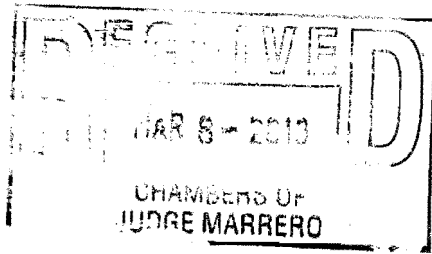


Berger & Montague, P.C.

ATTORNEYS AT LAW



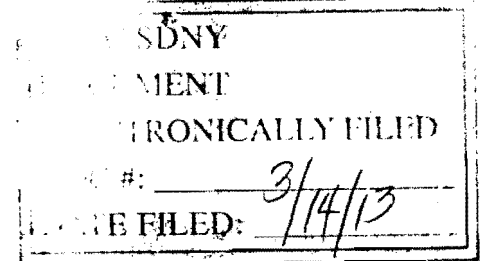
March 7, 2013

LAWRENCE J. LEDERER ALSO ADMITTED IN DC

WRITER'S DIRECT DIAL 215/875-4625

WRITER'S DIRECT FAX 215/875-4604

WRITER'S DIRECT E-MAIL llederer@bm.net

**By FedEx Overnight Delivery**

The Honorable Victor Marrero
 United States District Judge
 Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street
 New York, New York 10007-1312

The Honorable Debra Freeman
 United States Magistrate Judge
 Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street
 New York, New York 10007-1312

Re: *Dodona I, LLC v. Goldman, Sachs & Co., et al.*
10 Civ. 7497 (VM)(DCF) (S.D.N.Y.)

Dear Judge Marrero and Judge Freeman:

We represent lead plaintiff Dodona I, LLC ("Plaintiff"). We write on behalf of Plaintiff and all defendants, including Goldman, Sachs & Co., The Goldman Sachs Group, Inc., Peter L. Ostrem, and Daryl K. Herrick (the "Goldman Sachs Defendants") (together, the "Parties"), to jointly request that the Court adjourn the Case Management Conference scheduled originally for March 15, 2013.

The Parties respectfully propose that the Court reschedule the Case Management Conference to August 1, 2013, or any day during the week of August 5, 2013 or thereafter, subject to the Court's convenience. The suggested date of August 1, 2013 is one day after the proposed deadline for the close of briefing on Plaintiff's pending motion for class certification (*see* Dkt. 107), and three days after the proposed deadline for the close of fact discovery, as set forth in the Stipulation and [Proposed] Order that the Parties entered and submitted to Judge Freeman on February 11, 2013 (the "Stipulation"). A copy of that Stipulation is attached as Exhibit 1.

By way of background, the March 15, 2013 Case Management Conference was set by the Court's original Civil Case Management Plan and Scheduling Order dated June 4, 2012 (the "Original Scheduling Order") (Dkt. 89 at ¶ 11). The Original Scheduling Order also sets forth

Berger&Montague,P.C.

ATTORNEYS AT LAW

The Honorable Victor Marrero
The Honorable Debra Freeman
March 7, 2013
Page 2

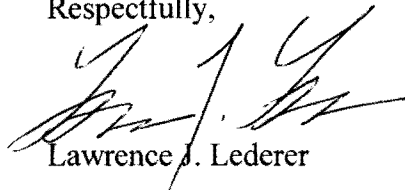
other major scheduling dates through summary judgment. By Order on September 28, 2012 (Dkt. 94), Judge Freeman approved a 60 day extension of the deadline for Plaintiff to file its motion for class certification. Consistent with ¶ 8(a) of the Court's Original Scheduling Order, Judge Freeman also directed in her September 28, 2012 Order that the Parties negotiate a briefing schedule concerning Plaintiff's motion for class certification. On February 11, 2013, the Parties submitted to Judge Freeman their joint proposed briefing schedule via their Stipulation. That Stipulation also proposes to extend the deadline for the completion of fact discovery to July 29, 2013.

Accordingly, the Parties respectfully request that the March 15, 2013 Case Management Conference be adjourned and rescheduled to follow the proposed July 31, 2013 close of briefing on Plaintiff's class certification motion, and the proposed July 29, 2013 deadline for completion of fact discovery.

In accordance with Judge Marrero's Individual Practices at § I.F and Judge Freeman's Individual Practices at § 1.E, we note that the Parties have not previously requested an extension of the fact discovery deadline, or an adjournment of the Case Management Conference. Also in accordance with § I.F of Judge Marrero's Individual Practices and § 1.E of Judge Freeman's Individual Practices, a Proposed Revised Civil Case Management Plan and Scheduling Order is attached as Exhibit 2. For the Court's convenience, we are submitting that Proposed Revised Order in both clean and redline formats (with the redline version reflecting the proposed changes to the Original Scheduling Order filed June 4, 2012 as amended on September 28, 2012).

We are prepared to provide any additional information the Court may request.

Respectfully,



Lawrence J. Lederer

LJL:skn
Enclosures
cc via FedEx Overnight: Counsel for All Parties

kal5763822_920_1.doc

The Clerk of Court is directed to enter into the public record of this action the letter above submitted to the Court by

the parties

SO ORDERED.

3-14-13

DATE



VICTOR MARRERO, U.S.D.J.